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2600 Bull Street
Columbia, SC 29201-1708

July 14, 2003

Mr. J. I. Palmer, Jr., Regional Administrator
United States Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Dear Mr. Palmer

As requested by Governor Mark Sanford, the Department of Health and Environmental Control (DHEC) submits this letter and supporting information in response to the United States Environmental Protection Agency's (EPA) letter of March 19, 2003. In this letter EPA requested updated recommendations for 8-hour ozone National Ambient Air Quality Standard designations. In making our recommendations we have followed EPA guidance to the degree possible and practical. As requested by EPA, our recommendations are based on 2000, 2001, and 2002 monitored ozone data. Because 2003 ozone data will be available prior to final designations being made by EPA, states should be provided the opportunity to update their recommendation accordingly.

As you are aware, determining the size of boundaries for non-attainment areas is an extremely difficult and controversial task. The debate centers around the advantages and disadvantages in establishment of smaller versus larger boundary areas. This discussion should not distract us from our ultimate goal – attainment of the standard as expeditiously as possible. As stated in Governor Sanford's letter to you dated July 14, 2003, EPA should give great deference to the judgment of the states in determining what steps are needed to assure prompt compliance with the national 8-hour ozone standard.

Our recommendations carry with them our commitment to comply with the national 8-hour ozone standard in an expeditious manner. The commitment to bring cleaner air sooner to the citizens of South Carolina is shared by our local leaders and is demonstrated by forty-five of South Carolina's forty-six counties which have joined us in a state-wide ozone early action initiative to attain compliance with the 8-hour standard no later than December 2007.

While EPA may be concerned about interstate designation issues in the Aiken-Augusta and the Charlotte-Rock Hill areas, EPA should delineate any South Carolina areas independently from any adjacent state's areas. This will facilitate any area of ozone non-attainment being re-designated as attainment as expeditiously as possible. The Department continues to be committed to working with adjacent states to assure mutual attainment of national air quality standards. An example of our commitment is the March 14, 2003 Memorandum of Understanding between DHEC and North Carolina's Department of Environment and Natural Resources which addresses mutual air quality concerns and cooperative actions.

I hope the attached supporting information is sufficient to allow your concurrence with our recommendations. However, should you have any questions or concerns or should your staff need additional information regarding this matter, please contact me at (803) 896-8940 or Jim Joy, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,

R. Lewis Shaw, P.E., Deputy Commissioner
Environmental Quality Control

Cc Governor Mark Sanford
Earl Hunter, SCDHEC Commissioner